



1-408.9 - 1477

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

L-01525
MAY 28 10 25 AM '98

MAY 28 1998

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

REPLY TO THE ATTENTION OF: SRF-5J

RE: OU 1 Transportation
and Disposal Plan

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) transportation and disposal plan for remedial activities at Operable Unit (OU) 1.

This document provides a description of how rail transportation and disposal operations will be conducted to ensure safe and successful transportation of OU 1 wastes from the site to a commercial disposal facility.

In general the document is consistent and in conformance with the remedial design package for the waste pit remedial action project dated February 13, 1998. However, additional information is needed to clarify a few issues.

Therefore, U.S. EPA conditionally approves the transportation and disposal plan pending receipt and incorporation of adequate responses to the attached comments. U.S. DOE must submit responses to comments and a revised final transportation and disposal plan for OU 1 within thirty (30) days receipt of this letter.

TECHNICAL REVIEW COMMENTS ON
"TRANSPORTATION AND DISPOSAL PLAN FOR OPERABLE UNIT 1"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENT

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Not Applicable (NA) Page #: NA Line #: NA
Original General Comment #: 1
Comment: In accordance with the standard format of Fernald Environmental Management Project documents, the transportation and disposal plan (TDP) should be revised to include line numbers for easy referencing of the text.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.2 Page #: 2-1 Line #: NA
Original Specific Comment #: 1
Comment: The text describes the primary rail route from Shandon Yard to the commercial disposal facility (CDF) only. However, Item 6 of Section 1.2 on Page 1-1 of the TDP indicates that waste can be disposed of in the CDF or the U.S. Department of Energy's Nevada Test Site (NTS). The TDP should therefore be revised to describe the primary rail route to the NTS as well as to the CDF.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.3.2 Page #: 2-2 Line #: NA
Original Specific Comment #: 2
Comment: The text refers to Figure 2-1 as a photograph of the Okeana Trestle before the upgrade and to Figure 2-2 as a photograph of the current condition of the trestle. However, the photographs appear to be reversed in order. Either the text should be revised to correctly refer to the photographs or Figure 2-1 should be made Figure 2-2 and vice versa.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.2.2 Page #: 3-1 Line #: NA
Original Specific Comment #: 3
Comment: The text states that the rail cars will be radiologically surveyed. However, the equipment and procedure for the radiological survey and the criteria to be used to interpret survey results to determine the need for decontamination are not discussed in the TDP. This information is also not included in the remedial design

E-2